

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 20-mj-411 KMM

UNITED STATES OF AMERICA,

Plaintiff,  
v.

BRYCE MICHAEL WILLIAMS,

Defendant.

**SEALED BY ORDER OF THE  
COURT**

**MOTION TO SEAL**

The United States of America, by its attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and Harry M. Jacobs and David P. Steinkamp, Assistant United States Attorney, respectfully submits this motion to file the Complaint and accompanying Affidavit of Special Agent Nathan R. Boyer under seal.

The United States seeks to seal the Complaint and Affidavit because the defendant, Bryce Michael Williams, is not yet in federal custody. Law enforcement officers investigating this case have expressed serious concern that if the Complaint and Affidavit are made public, and Bryce Michael Williams is alerted of his impending arrest on the federal warrant, there is a safety risk to Bryce Michael Williams and law enforcement taking him into federal custody.

Dated: June 15, 2020

Respectfully submitted,

ERICA H. MACDONALD  
United States Attorney

BY: s/ Harry M. Jacobs  
HARRY M. JACOBS  
DAVID P. STEINKAMP  
Assistant U.S. Attorneys